

RECEIVED

MAY 11 2023

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF MISSOURI  
DIVISION

SONKEY KEYS  
748 PREMIUM WAY  
CHESTERFIELD MO 63005

(Write the full name of each plaintiff  
who is filing this complaint. If the  
names of all the plaintiffs cannot fit in  
the space above, please write "see  
attached" in the space and attach an  
additional page with the full list of  
names.)

v.

JIM FARLEY  
Ford Motor Company  
P.O. BOX 6248  
DEARBORN MI 48126

(Write the full name of each defendant. 48126)  
The caption must include the names of  
all of the parties. Fed. R. Civ. P. 10(a).  
Merely listing one party and writing "et  
al." is insufficient. Attach additional  
sheets if necessary.)

Complaint for a Civil Case

Case No.  
(to be assigned by Clerk of  
District Court)

Plaintiff requests trial by jury:

☒ Yes ☐ No

CIVIL COMPLAINT

NOTICE:

*Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.*

*Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.*

*In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed without prepaying fees or costs.*

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>SIDNEY KEYS</u>
Street Address	<u>748 PREMIUM WAY</u>
City and County	<u>CHESTERFIELD</u>
State and Zip Code	<u>MISSOURI 63005</u>
Telephone Number	<u>(404) 671-0010</u>
E-mail Address	<u>KEYSCUSTOMCREATIONS750@gmail.com</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>FORD MOTOR CO. (Jim Farley)</u>
Job or Title	<u>CEO</u>
Street Address	<u>P.O. BOX 6248</u>
City and County	<u>DEARBORN MI 48126</u>
State and Zip Code	<u>DEARBORN MI 48126</u>
Telephone Number	<u>UNKNOWN</u>
E-mail Address	<u>UNKNOWN</u>

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant. If you are suing for violation of your civil rights, you must state whether you are suing each defendant in an official capacity, individual capacity, or both.)*

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the information for this case. (Include all information that applies to your case)

### A. Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

RACIAL DISCRIMINATION AND RACIAL  
HARASSMENT By GLENN, MANAGER  
AUTO REPAIR DEPT. AT 10950 PAGE AVE,  
ST. LOUIS, MO.  
63132

### B. Suit against the Federal Government, a federal official, or federal agency

List the federal officials or federal agencies involved, if any.

### C. Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation, and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

#### 1. The Plaintiff(s)

The plaintiff, (name) SIDNEY KEYS, is a citizen of the  
State of (name) MISSOURI.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

If the defendant is an individual

The defendant, (name) SONEY KEYS, is a citizen  
of the State of (name) \_\_\_\_\_ Or is a citizen  
of (foreign nation) \_\_\_\_\_.

If the defendant is a corporation

The defendant, (name) Jim FARLEY  
is incorporated under the laws of the State of (name) \_\_\_\_\_  
\_\_\_\_\_, and has its principal place of  
business in the State of (name) \_\_\_\_\_ Or  
is incorporated under the laws of the State of (foreign nation)  
\_\_\_\_\_, and has its principal place  
of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because *(explain)*:

**III. Statement of Claim**

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

① ON MULTIPLE OCCASSIONS I WAS HARASSED BY EMPLOYEES OF LOU FUSZ FORD MOTORS AND DISCRIMINATED BASED ON RACE.

② THEY MADE ME PAY CASH FOR MY DOWN PAYMENT TO BUY A CAR (EMPLOYEE - DION) \$1500.00 ~~AND~~ A USED CAR AND I QUALIFIED FOR A BRAND NEW CAR WITH NOTHING DOWN.

③ REFUSAL TO REPORT MY VEHICLE PAYMENTS TO THE CREDIT BUREAU, I WALKED INSIDE LOU FUSZ LOCATED ON 10950 PAGE AVE ST. LOUIS MO. AND MADE MY CAR PAYMENT TO THE RECEPTIONIST AND ON MULTIPLE OCCASSIONS I ASKED THEM TO PLEASE REPORT MY

**IV. Relief** AUTO PAYMENTS TO THE RESPECTFUL CREDIT BUREAU

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

BUT THEY REFUSED TO REPORT MY PAYMENTS, I BOUGHT THE CAR IN JUNE 2022, MADE MY PAYMENTS ON TIME AND LOU FUSZ OF FORD DID NOT REPORT MY PAYMENTS TO THE CREDIT BUREAU UNTIL ~~END~~ APRIL 2023

(1) RACIAL DISCRIMINATION  
AND HARASSMENT

(2) REFUSAL TO REPORT  
my VEHICLE PAYMENT TO  
THE Appropriate Credit  
Bureau (I WALKED INSIDE OF LOAN FUSE)  
LOCATED ON 10950 PAGE BLVD ST.

(3) REFUSAL TO GIVE ME A TO  
LOAN NO. 63132 AND MADE MY  
CAR PAYMENTS IN PERSON AND ASKED  
PLEASE REPORT MY PAYMENT  
TO the CREDIT BUREAU  
WHEN my VEHICLE  
WAS BEEN REPAIRED 6 TIMES  
DIFFERENT

A AUTO REPAIR THAT WAS LOAN  
FUSE FORD FALCON 8 MONTH. PLES.  
FINANCE

(5) MY BRAKES WENT OUT ON ME  
5 DIFFERENT TIMES THE FIRST WEEK THAT  
I BOUGHT THE CAR

② ~~ED~~ Lou Furz Auto Repair  
SHOP REPAIRED THE ~~BREA~~ BRAKES  
3 Times AND I STILL HAVE  
Problem,

⑦ THE BATTERY WENT OUT THE  
First month that I HAD THE  
VEHICLE

⑧ my VEHICLE WAS TOWED 7  
Times AND me AND my FAMILY OF  
5 WAS STRANDED, Lou Furz TOWING  
COMPANY TOWED my VEHICLE BECAUSE  
THEY WERE AT FAULT OF my  
CAR BREAK DOWN

⑨ I PUT \$1500.00 CASH DOWN  
PAYMENT -to PURCHASE my VEHICLE, DION  
SAID THEY ONLY TAKE CASH, ~~AND TO~~  
~~BUT~~ I QUALIFIED FOR A BRAND NEW CAR WITH  
WORKING DOWN)

Do you claim the wrongs alleged in your complaint are continuing to occur now?

Yes ☒ No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒ No ☐

Do you claim punitive monetary damages?

Yes ☒ No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

UNKNOWN (PTSD) DISABLED MARINE  
CORP VETERAN

#### V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 11 day of MAY, 2023

Signature of Plaintiff(s) [Signature]